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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

CHURCH OF SCIENTOLOGY OF CALIFORNIA) No. BC 074815
Plaintiff)

Vs.

LARRY WOLLERSHEIM ,
Defendant.

Date: June 24, 1993 Time: 9:00 a.m. Dept: 14

DECLARATION OF VICKI AZNARAN

I, Vicki Aznaran, declare:

The attached Declaration of Vicki Aznaran, which I signed on July 18, 1990, is a true copy of a declaration submitted in the USA v. Fishman case. I have personal knowledge of the 93 facts set forth therein, and they are true and correct. I declare under penalty of perjury that the foregoing is true and 24 correct. Executed this 24th day of June, 1993 at Dallas, Texas.

Vicki Aznaran

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

CASE NO. CR-88-0616-DLJ

UNITED STATES OF AMERICA,
Plaintiff

v.
STEVEN FISHMAN,
Defendant.

DECLARATION OF VICKI AZNARAN

I, VICKI AZNARAN declare as follows under penalty of perjury:

I joined the Church of Scientology in 1972. In 1978, after approximately four years as staff members, my

husband and I joined the Sea Organization. From 1978 to early 1987, my husband and I worked most of our waking hours, with very few days off, at our various assignments within Scientology. I eventually became President of Religious Technology Center and, supposedly, the top "ecclesiastical" authority within Scientology. Richard was a high-level security officer. During this period my husband and I became intimately familiar with the structure and activities of various Scientology organizations. Among other things, I was briefed on and was sometimes a participant in meetings involving litigation tactics and various means used to attack and fight "enemies" of Scientology. In numerous instances I was in the chain of command for approval for such activities. From 1984 to 1987, I held the office of Inspector General, one of the highest worldwide offices in the organization and so was privy to the most arcane practices of the group.

The legal strategy of Scientology and the existence of numerous potential legal problems, some of which are set forth below, were known to me when I was a staff member in Scientology. Enemies of Scientology are deemed to be "suppressive persons" ("SPs"). One becomes a "suppressive person" by doing a suppressive act, such as suing Scientology as a litigant or lawyer. In the jargon of Scientology, when one is "declared" this means that one has been declared a "suppressive person" and, therefore, may be harassed, hurt, damaged or destroyed without regard to truth, honesty or legal rights. It is considered acceptable within Scientology to lie, cheat, steal and commit illegal acts in the name of dealing with a "suppressive person."

This practice or policy is sometimes referred to as the policy of "fair game." In the jargon of Scientology a person who is "declared" is understood to be a suppressive person. This means that the person is "fair game." The fair game policy was issued in the 1960s. It was never cancelled. A document was issued for public relations reasons that purportedly cancelled "fair game"; however, that document stated that it did not change the manner of handling persons declared "SP." In reality, the purported cancellation of fair game is at most a matter of semantics. Enemies of Scientology are treated as "fair game."

David Miscavige was the Chairman of the Board of Author Services Inc., ("ASI") in 1984 and 1985. ASI was incorporated to be the funnel through which profits from Scientology were channelled to L. Ron Hubbard and, therefore, it was very important within Scientology. Miscavige represented Hubbard in all aspects of controlling Scientology. He attended regular meetings with myself and other top officials of Scientology organizations to review the status of all Scientology's activities, including its litigation and dirty tricks campaigns against Scientology's enemies.

Because of my position and the regular reports that came across my desk I know that throughout my presidency of RTC that fair game actions against enemies were commonplace. In addition to the litigation tactics described below, fair game activities included burglaries, assaults, disruption of enemies' businesses, spying, harassing investigations, abuse of confidential communications in parishioner files and so on. I specifically recall seeing one report regarding attacks against Bent Corydon after Scientology became aware that he was writing a book against Hubbard.

Other Hubbard writings encourage Scientologists to pursue litigation purely for harassment without regard to the merits of a claim to cause enemies to fold. Hubbard's writings state:

"The purpose of the suit is to harass and discourage rather than to win...The law can be used very easily to harass, and...will generally be sufficient to cause [the enemy's] professional decease. If possible, of course ruin him utterly." Hubbard, "Magazine articles on Level O Checksheet" American Saint Hill Organization 1968.

As President of RTC and a Sea Organization member, I attended meetings concerning the numerous legal actions involving Scientology organizations. During this time period, I had personal access to all legal documents having to do with RTC. I received a report every day on my computer that included a synopsis of each ongoing legal cases involving Scientology. I received, or so I was told, copies of every major motion filed in cases involving Scientology. I was on the "approval lines" for legal documents dealing with RTC. During this time period, I had the option of attending legal meetings, although some were mandatory. I attended many litigation meetings and became generally aware of Scientology's dirty tricks and legal maneuvers. On specifics, I frequently deferred to in-house and outside counsel; however, at least in theory, I was the head of RTC and had access to any business or litigation "secrets" of Scientology.

It is the stated policy and practice of Scientology to use the legal system to abuse and harass its enemies. This crude, fundamental directive of Scientology is no secret. The policy is to do anything and everything possible to

harass the opposing litigant without regard to whether any particular motion or maneuver is appropriate or warranted by the facts or applicable law. That policy was followed in every legal case I was involved with or learned about while a member of the Sea Organization. The management of Scientology consistently expressed and demonstrated a complete disdain for the court system, viewing it as nothing more than a method to harass enemies. Some examples of this are set forth below.

During litigation between Gerald Armstrong and Scientology, which was before Judge Breckenridge of Superior Court for Los Angeles County, the court ordered the production of Armstrong's pre-clear ("PC") folders. These are files maintained by Scientology on those who submit to interrogation sessions in a process called auditing. During the course of that litigation I was ordered to go through Armstrong's folders and destroy or conceal anything that might support Armstrong's claims against Scientology. This practice is known within Scientology as "culling PC folders" and is a common litigation tactic employed by Scientology.

During other litigation in Los Angeles known to me as the Wollersheim case, I was told that the judge had ordered the production of Wollersheim's folders. As ordered, I "culled" these files. In other words, I removed contents that might have been damaging to Scientology or might have supported Wollersheim's claims against Scientology. For example, I removed evidence of events involving his family, the anguish this caused him, evidence of disconnection from family and evidence of fair game.

I was involved in numerous meetings concerning what is known to me as the Christofferson case in Portland, Oregon. This case was tried twice. In the first case, a Scientology witness by the name of Martin Samuels was coached and drilled for hours on how to lie convincingly or avoid telling the truth. Before or during the second trial he admitted to this course of conduct. In this litigation, a Scientologist by the name of Joan Shriver produced responsive documents that may have been incriminating. This was a serious breach of policy for which she was punished. These documents were ordered produced on such short notice that apparently files were not thoroughly "culled." In another case, an attorney was severely criticized and almost fired for failing to properly coach and feed the desired answers to Heber Jentsch. Mr. Jentsch was, for public relations reasons, the purported head of the Church of Scientology International. During his deposition, Mr. Jentsch was unable to answer fundamental questions concerning the management of Church of Scientology International.

In later 1979 and early 1980, there was a massive document destruction program undertaken to destroy any evidence showing that L. Ron Hubbard ("LRH") controlled Scientology. I participated in this activity in Clearwater, Florida and am informed that there was also intensive document destruction at facilities in Gilman Hot Springs, California. From at least that point onward there was a continuous effort to hide or destroy any evidence of Hubbard's control. For example, during an IRS investigation in 1984 and 1985, while in bed with pneumonia, I was ordered out of bed by Norman Starkey, who told me that they had received a tip from a Los Angeles police officer advising them of a pending IRS raid in Los Angeles. Mr. Starkey ordered me to go to a computer facility and insure that all information on the computers in Los Angeles that might show Hubbard's involvement and control of Scientology's money was destroyed except for one copy of each document. These copies were to be saved on computer disks which were to be hidden in secure storage places. At the time I was also instructed to destroy anything that would show the control of Mr. Starkey or Mr. Miscavige over Scientology.

In or about 1981, while working in a Scientology organization known as the Guardian's Office, I had access to and observed various written and oral communication pertaining to illegitimate activities participated in by the Guardian's Office. The Guardian's Office attempted to infiltrate both governmental and private agencies including the IRS, the Department of Justice, and the American Medical Association and the National Institute of Mental Health. The purpose of this was to steal documents pursuant to Hubbard's "Snow White" program. The goal of this program was to eliminate any negative reports about Hubbard and Scientology that may have been held by these various agencies.

While involved in Scientology I became aware of various operations directed against an author who had written a negative book about Scientology. The author, Paulette Cooper, was subjected to various forms of harassment. One operation included an attempt to frame her. A false bomb threat was written. Scientology agents lifted a fingerprint from Cooper's apartment. These fingerprints were then transferred to the bomb threat letter. Ms. Cooper was subjected to an investigation and was not cleared until an FBI raid resulted in the seizure of Scientology documents that exposed the operation as a frame-up. There was at least one other operation directed against Ms. Cooper. The substance of it was to plant a boyfriend to reinforce and play upon her suicidal tendencies in the hopes that she would commit suicide.

In 1976 and 1977, the then-Mayor of Clearwater, Florida, Gabe Cazares, was involved with litigation against Scientology. Arrangements were made to have an attorney by the name of Merrill Vanniere, a Scientologist, represent Mr. Cazares and sabotage his case. This plot was also exposed by documents obtained in an FBI raid of a Scientology facility. Also, in response to Mr. Cazares' litigation against Scientology, an attempt was made to implicate Mr. Cazares in a staged hit-and-run accident.

During an IRS criminal investigation in the 1984 to 1985 time period, the IRS ordered production of various communications between Hubbard and Author Services, Inc. (ASI). The ASI staff worked literally day and night for several days reviewing documents so that unfavorable documents could be destroyed or otherwise concealed from the IRS. Lyman Spurlock and Marion M. Dendue, Scientologists involved in this operation, informed me of this operation. Also during this IRS investigation, my husband, Rick Aznaran, was ordered to remove and conceal any incriminating documents from certain locations. He was also directed to make the computer network "raid proof." This involved creating a system where incriminating documents could be deleted from computer storage rapidly and before the IRS could obtain control over the computers.

I have examined certain documents regarding Steven Fishman's experience with Scientology, have had conversations with Mr. Fishman's counsel, and have reviewed the 1151-page autobiographical account of Mr. Fishman's Scientology experience entitled "The Lonesome Squirrel." Based upon my 15 years of experience in Scientology and my review of the Fishman materials, I offer the following conclusions:

1. I believe Mr. Fishman's assertions that he was a member since 1979 and that he was as actively involved as he states. This belief is based on my experience that only a committed member of long standing would know the details of the inner workings of the group; Mr. Fishman has such knowledge. Awareness of certain confidential projects could be achieved only by a member who was trusted by the hierarchy; Mr. Fishman had such awareness. Involvement in a group that thrives on secrecy and excludes most members from participation in high-level projects means that any member who exceeds a certain level of involvement enjoys the trust of the leadership; such trust would be earned only by extended membership. Mr. Fishman enjoyed that trust. His accounts of meetings with high-level officials and his knowledge of the operations and functions of the hierarchy are so detailed and accurate that they couldn't have been gained except through direct personal experience.
2. Refutation by Scientology officials of Mr. Fishman's membership prior to February 8, 1986, and their disclaimer of his involvement and their lack of any records pertaining to such membership is perfectly consistent with their standard procedure in protecting themselves. As noted above, I was personally involved in the destruction of records when it suited their purpose. Scientology propounds the belief that any action whatsoever taken to protect the organization is justified, as the group takes precedence over the individual. Any member performing criminal acts for the benefit of the group was kept at arm's length; if apprehended, the member was disavowed by Scientology. This procedure was used even on the wife of the founder of Scientology. Given the serious potential threat that Mr. Fishman's defense posed to the group, I find Mr. Fishman's account of certain members of Scientology's involvement in the plan to fabricate the threats against Mr. Fishman and his counsel and to thereby undermine Mr. Fishman's credibility and render him useless as a witness against Scientology to be consistent with their modus operandi.

I declare under penalty of perjury under the laws of the State of Texas that the foregoing is true and correct.

Executed this 18th day of July, 1990, in Dallas, Texas.

[signed]
VICKI AZNARAN

